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**From:** John Mays [jmays@powertechuranium.com]  
**Sent:** 2/19/2019 12:54:55 PM  
**To:** Robinson, Valois [Robinson.Valois@epa.gov]; Minter, Douglas [Minter.Douglas@epa.gov]  
**CC:** Bahrman, Sarah [Bahrman.Sarah@epa.gov]; Blake Steele [blake@azargaresources.com]  
**Subject:** Re: Powertech's Draft Approach to Aquifer Exemption Boundary for Dewey-Burdock Class III UIC Draft Permit  
**Attachments:** 2019\_02\_18\_Final Letter to EPA.pdf; ProposedAEBwith1000ftBufferFinal.pdf

Douglas and Valois,

Please see the attached final letter. Please note our responses in the below thread to your questions.

Last week we relocated our office so please also see our new mailing address:

Powertech (USA) Inc.  
5200 DTC Parkway, Suite 280  
Greenwood Village, CO 80111

Sincerely,

John



*John M. Mays*

Chief Operating Officer

Azarga Uranium Corporation

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**From:** "Shea, Valois" <Shea.Valois@epa.gov>  
**Date:** Friday, February 8, 2019 at 4:23 PM  
**To:** John Mays <jmays@powertechuranium.com>  
**Cc:** "Minter, Douglas" <Minter.Douglas@epa.gov>, "Bahrman, Sarah" <Bahrman.Sarah@epa.gov>  
**Subject:** RE: Powertech's Draft Approach to Aquifer Exemption Boundary for Dewey-Burdock Class III UIC Draft Permit

Hi John,

Thanks for providing a draft letter for our review and the figure you attached.

For the final version of the letter, please change the addressee to:

Douglas Minter  
UIC Unit Manager  
USEPA Region 8  
Mailcode: 8WP-SUI  
1595 Wynkoop Street  
Denver, CO 80202

I have just two questions:

1. Just to make sure I understand correctly, the last sentence in paragraph 2.) states:  
"This is because the current AEB boundary within the draft permit currently overlaps into the 1,600 feet limit in the south Burdock Area."

I thought the buffer zone change was because some of the wellfield wells overlapped the 1,600-foot buffer.

This is correct. The AEB boundary is based on wellfield location and there is some overlap by wellfield wells.

2. Does the December 2018 *Technical Report Resource Estimate* using the 0.20 GT result in a change to the wellfield map? Section 14.2 *Cutoff Selection* on page 56 states: "Resource estimation also used a 0.20 GT cut-off for all drilling."

Does this statement indicate that the wellfield boundaries will expand to include the 0.20 GT areas? We can talk about the implications of using the 0.20 GT in more detail when we have our question and answer session. I bring it up in this email only to ask if the map you provided, and possibly the buffer area, should be updated as a result of the new resource estimate.

There are no changes currently planned as result of recent resource estimate. If there are to be changes, a submittal would be made in the form of an amendment to the permit. Powertech would not anticipate doing this until additional drilling is completed and the timing of any such amendment, if it occurred, would be foreseen after operations have begun.

If my two questions do not result in any changes, then the draft version we reviewed is good to go as the final version.

Please see attached the final version, with slight edits relative to your question #1 and updated addressee. Thanks!

Thanks!

Valois

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**From:** John Mays <[jmays@powertechuranium.com](mailto:jmays@powertechuranium.com)>

**Sent:** Thursday, December 13, 2018 1:01 PM

**To:** O'Connor, Darcy <[oconnor.darcy@epa.gov](mailto:oconnor.darcy@epa.gov)>; Benevento, Douglas <[benevento.douglas@epa.gov](mailto:benevento.douglas@epa.gov)>

**Cc:** Minter, Douglas <[Minter.Douglas@epa.gov](mailto:Minter.Douglas@epa.gov)>; Shea, Valois <[Shea.Valois@epa.gov](mailto:Shea.Valois@epa.gov)>; Blake Steele <[blake@azargaresources.com](mailto:blake@azargaresources.com)>; Hal <[hdemuth@petrotek.com](mailto:hdemuth@petrotek.com)>

**Subject:** Powertech's Draft Approach to Aquifer Exemption Boundary for Dewey-Burdock Class III UIC Draft Permit  
Mr. Benevento and Mrs. O'Connor,

Please see the attached letter describing Powertech's draft proposal regarding procedures for locating the Aquifer Exemption Boundary.

We have also included a draft map to help illustrate the proposal.

Your feedback on the approach would be greatly appreciated.

Sincerely,

John



**John M. Mays**

Chief Operating Officer

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